

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

HANA F. AL JADER

) CRIMINAL ACTION
)
)
)
)
)

NO. 05-10085-RCL

**ASSENTED MOTION TO CONTINUE
INITIAL STATUS CONFERENCE AND DEFENDANT'S
MOTION TO MODIFY CONDITIONS OF RELEASE**

NOW COMES, the Defendant Hana F. Al Jader through undersigned counsel and the Office of the United States Attorney through S. Theodore Merritt, and respectfully move this Honorable Court for an order continuing the initial status conference, and Defendant's Motion to Modify Conditions of Release from May 18, 2005 to June 9, 2005.

In support thereof counsel represents as follows:

1. The initial status conference was schedule by the Court for May 12, 2005 at 3:00 p.m. and subsequently rescheduled for May 18, 2005.
2. Counsel for the Defendant, James Michael Merberg, a sole practitioner is scheduled to be before the Court in the matter of Delligatti v. Hung, Docket No. V-01469-05-05A on Wednesday May 18, 2005.
3. Counsel for the parties have conferred and would request, based on the unavailability of defense counsel, that the initial status conference and the Defendant's Motion to Modify Conditions of Release be rescheduled from May 18, 2005 to June 9, 2005 at 2:00 p.m.
4. The Defendant through counsel agrees and acknowledges that the period of time between May 18, 2005 and June 9, 2005 is excludable.

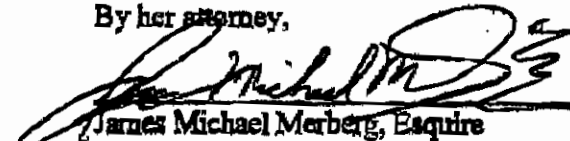
WHEREFORE, the Defendant and the Office of the United States Attorney respectfully move this Honorable Court for an order continuing the initial status conference and Defendant's Motion to Modify Conditions of Release from May 18, 2005 to June 9, 2005.

Respectfully submitted,
Michael J. Sullivan
United States Attorney



By S. Theodore Merritt, Esquire
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Respectfully submitted,
Hana F. Al Jader
By her attorney,



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